

Oil Spill Response Equipment Annual Inspections

Oil Spill Response Requirements For
Facilities Located Seaward
of The Coast Line

30 CFR 254

NTL No. 2002-G09

The “Equipment Inventory” Appendix? 30 CFR 254.24

- (a) An inventory of spill-response materials and supplies, services, equipment, and response vessels available locally and regionally.
- (b) A description of the procedures for inspecting and maintaining spill-response equipment in accordance with 30 CFR 254.43

What Information Must I Include In The “Contractual Agreements” Appendix 30 CFR 254.25

The “Contractual agreements” appendix must furnish proof of any contracts or membership agreements with OSRO’s, cooperatives, spill-response service providers.....

The contract or membership agreement must ensure the availability of the personnel and/or equipment on a 24-hour-per-day basis.

Records

30 CFR 254.40

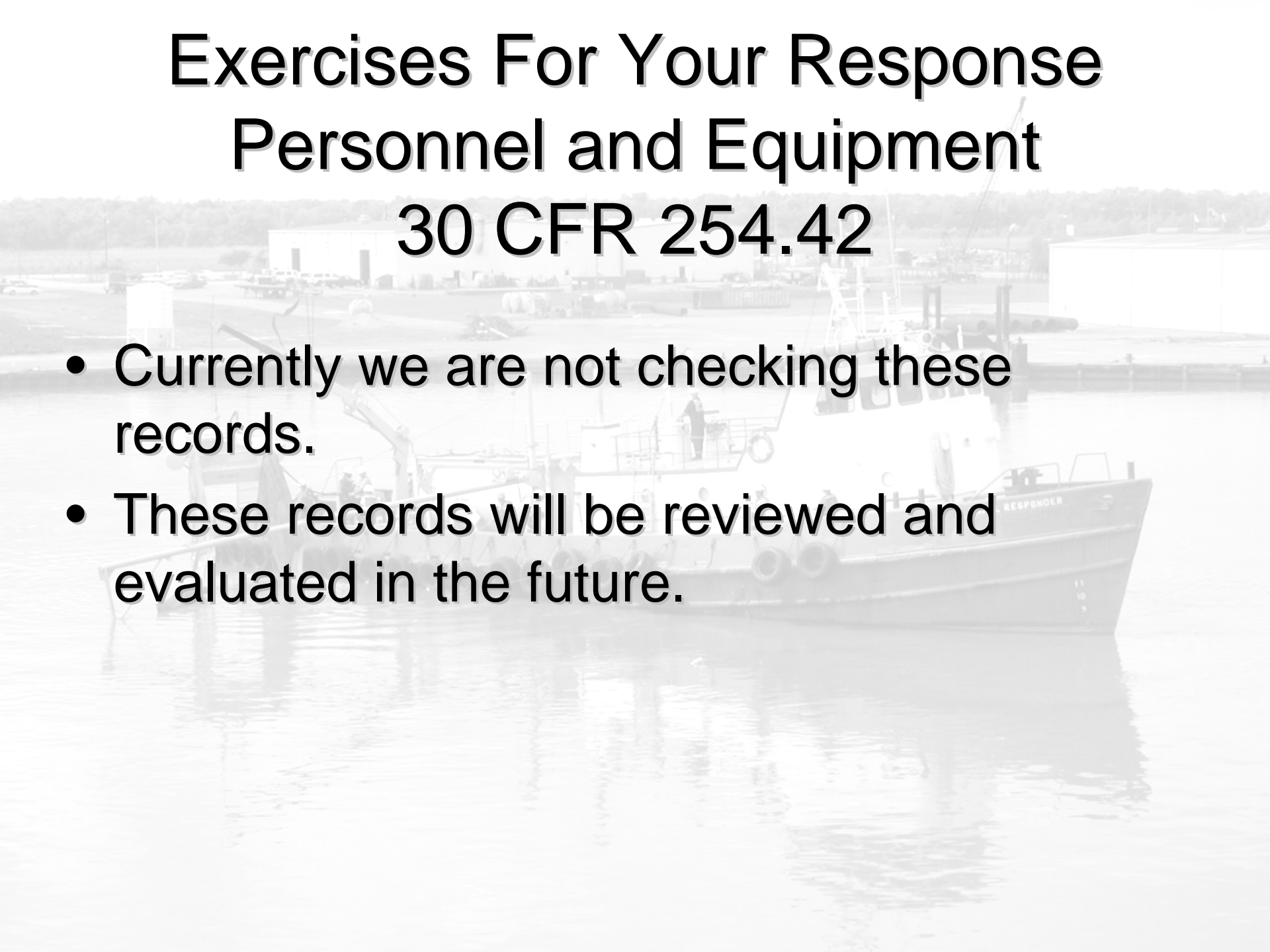
You must make all records of services, personnel, and equipment provided by OSRO's or cooperatives available to any authorized MMS representative upon request.

Exercises For Your Response Personnel and Equipment 30 CFR 254.42

- (b)(2) An annual deployment exercise of response equipment identified in your plan that is staged at onshore locations. You must deploy and operate each type of equipment in each triennial period.
- (e) Records showing that OSRO's and oil spill removal cooperatives have deployed each type of equipment must be maintained for the 3-year cycle.

Exercises For Your Response Personnel and Equipment 30 CFR 254.42

- Currently we are not checking these records.
- These records will be reviewed and evaluated in the future.



Maintenance and Periodic Inspection of Response Equipment.

30 CFR 254.43

- (a) You must ensure that the response equipment listed in your response plan is inspected at least monthly and is maintained, as necessary, to ensure optimal performance.
- (b) You must ensure that records of the inspections and maintenance activities are kept for at least 2 years and are available to any authorized MMS representative upon request.

MMS Inspection Process Notification

- Notify the OSRO of the Unannounced Oil Spill Equipment Inspection by calling into their 1-800 number.
- The Notification call is made just prior to conducting the inspection.
- We document the entire inspection process
 - Time of contact and the name of the person whom you contacted.
 - OSRO representative arrival time and MMS arrival time at the OSRO's facility.

MMS Inspection Process Records Review



- Monthly maintenance records.
- The equipment inventory List.
 - Note any equipment that had problems in recent months. And include that piece of equipment in the operational part of the inspection process

MMS Inspection Process

Equipment Review

- Verify the equipment inventory List.
- Note the condition of the Equipment.
- Have the OSRO representative operate the selected pieces of equipment, including those identified from monthly maintenance records as having recent problems.

MMS Inspection Process Documentation Review

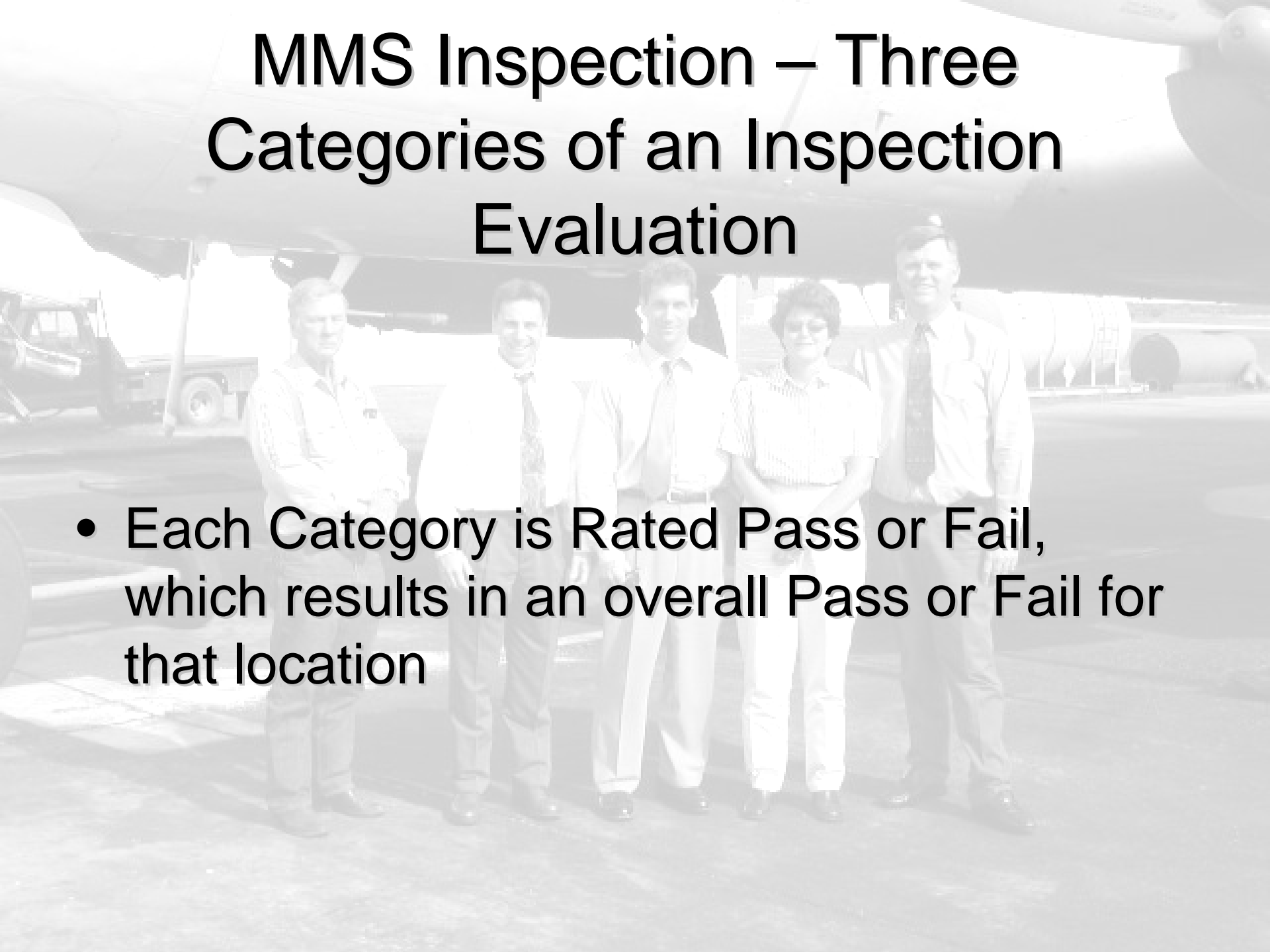
- All of the information from the field is sent to out regional office for processing
- This includes a review of;
 - Inventory documentation
 - Maintenance documentation
 - Operational documentation
 - Inspection Rating – Pass or Fail
 - Added detail or general comments

Final Inspection Evaluation

- MMS Inspection – Three Categories of an Inspection Evaluation
 - Category 1 - Equipment Availability
 - Category 2 - Operational Readiness
 - Category 3 - OSRO's Inspection and Maintenance Records

MMS Inspection – Three Categories of an Inspection Evaluation

- Each Category is Rated Pass or Fail, which results in an overall Pass or Fail for that location



MMS Inspection Team

- **MMS Region** **Alton Bates**
- **New Orleans District** **Lynard Carter**
- **Houma District** **Brad Hunter**
- **Lafayette District** **Marty Rinaudo**
- **Lake Charles District** **David Stanley**
- **Lake Jackson District** **Harry Fitzgibbon**
- **Corpus Christi District** **John Sheive**

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